

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.: 4:13-cr-58 HEA (SPM)
	)	
JEFFREY ELLERBECK,	)	
	)	
Defendant.	)	

**SECOND MOTION TO TRAVEL**

COMES NOW Defendant, Jeffrey Ellerbeck, by and through counsel, and files the following motion to travel from Denver, Colorado to Omaha, Nebraska from December 28, 2013 to January 4, 2014. In support of this motion, Defendant states as follows:

1. Defendant's previously filed motion for travel was granted on December 18, 2013.
2. Defendant became very ill over this past weekend, however, and was unable to travel as planned.
3. Defendant now wishes to take the exact same trip from December 28, 2013 through January 4, 2014.
4. If permitted to travel, Defendant will leave Denver, Colorado on December 28, 2013 and return to Denver on January 4, 2014.
5. If permitted to travel, Defendant will stay with his mother at 1105 N. 93<sup>rd</sup> Street, Omaha, Nebraska 68114 and share the holidays with her.
6. If permitted to travel, Defendant will contact his pretrial services officer, as

directed, while outside the District of Colorado.

7. Defendant has been on bond since February 1, 2013 and has incurred no violations in that time.

8. Defendant, through counsel, has discussed this matter with assistant United States attorney Stephen Casey. Mr. Casey does not object to Defendant's request.

9. Defendant, through counsel, has attempted to discuss this matter with pretrial services officer Dee Clark from the District of Colorado. Ms. Clark, however, was out of the office and her position is unknown.

WHEREFORE, Defendant respectfully request this Honorable Court permit him to travel from Denver, Colorado to Omaha, Nebraska from December 28, 2013 to January 4, 2014.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Marc M. Johnson  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on December 24, 2013, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Stephen Casey, assistant United States attorney.